

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Emergency Petition of Q Link Wireless, LLC	)	
for an Order Directing the Universal Service	)	
Administrative Company to Implement	)	
Machine-to-Machine Interfaces for the	)	
National Verifier	)	
	)	
Bridging the Digital Divide for Low-Income	)	WC Docket No. 17-287
Consumers	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	
Telecommunications Carriers Eligible for	)	WC Docket No. 09-197
Universal Service Support	)	

**COMMENTS OF TRACFONE WIRELESS, INC.**

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## **EXECUTIVE SUMMARY**

TracFone Wireless, Inc. (“TracFone”) supports the Emergency Petition of Q Link Wireless, LLC (“Q Link”) for an order directing the Universal Service Administrative Company (“USAC”) to implement application programming interfaces (“APIs”) between the online enrollment process offered by Lifeline service providers and USAC’s automated Lifeline eligibility verification conducted by the National Verifier. TracFone agrees with Q Link that USAC’s inexplicable withholding of APIs for this aspect of the National Verifier will greatly undermine the policy objectives of the Verifier by erecting additional barriers for eligible consumers to obtain Lifeline services while increasing the administrative burdens on USAC as well as Lifeline service providers.

Specifically, granting Lifeline carriers access to APIs and allowing USAC and service providers’ systems to communicate with each other seamlessly will improve consumers’ ability to enroll in Lifeline, help preserve the ability of carriers to partner with third-party organizations to facilitate enrollment, mitigate the significant administrative burdens on USAC and providers, and reduce the risk of fraud and abuse. Because USAC’s refusal to provide APIs to Lifeline service providers could lead to detrimental outcomes that directly contravene the Commission’s vision for the Verifier, TracFone urges the Commission to expeditiously grant Q Link’s Petition and reverse USAC’s misguided decision.

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**COMMENTS OF TRACFONE WIRELESS, INC.**

TracFone Wireless, Inc. (“TracFone”), through its attorneys, hereby offers comments in support of the Emergency Petition of Q Link Wireless, LLC (“Q Link”) for an order directing the Universal Service Administrative Company (“USAC”) to implement application programming interfaces (“APIs”) between the online enrollment process offered by providers of Lifeline services and USAC’s automated National Verifier Lifeline eligibility determination process.<sup>1</sup> TracFone agrees with Q Link that implementation of APIs as sought in the Petition will drastically improve the enrollment process for consumers and minimize administrative burdens on USAC as well as Lifeline service providers. Moreover, the inclusion of APIs will preserve the benefits of

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<sup>1</sup> Emergency Petition of Q Link Wireless, LLC for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier, WC Docket Nos. 17-287, 11-42, 09-197 (filed July 5, 2018) (“Q Link Petition”).

partnerships between providers and third-party organizations designed to facilitate Lifeline enrollment. Because machine-to-machine information exchanges between carriers' and USAC's online enrollment processes would better serve the Commission's goals for the Lifeline program, the Commission should expeditiously grant Q Link's Petition and reverse USAC's misguided decision.

**I. USAC'S FAILURE TO IMPLEMENT APPLICATION PROGRAMMING INTERFACES BETWEEN ETCS AND THE NATIONAL VERIFIER WILL UNDERMINE THE POLICY OBJECTIVES FOR THE NATIONAL VERIFIER.**

The Commission established the National Verifier in 2016 to serve as the exclusive and comprehensive source for Lifeline subscriber eligibility verification.<sup>2</sup> With the Verifier, the Commission sought to serve three policy goals: "to protect against and reduce waste, fraud, and abuse; to lower costs to the Fund and Lifeline providers through administrative efficiencies; and to better serve eligible beneficiaries by facilitating choice and improving the enrollment experience."<sup>3</sup>

As TracFone explained in its own recent Emergency Petition asking the Commission to correct USAC's implementation of the National Verifier as related to the enrollment databases used and proof of eligibility accepted by the Verifier, "[a]lthough well-intentioned, USAC's implementation of the National Verifier has suffered from significant flaws that have frustrated, rather than served, these policy objectives."<sup>4</sup> Q Link's Petition demonstrates that USAC's abrupt and unjustified failure to include APIs between the enrollment processes offered by eligible

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<sup>2</sup> *Lifeline and Link Up Reform and Modernization*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962 (2016) ("*2016 Lifeline Reform Order*").

<sup>3</sup> *Id.* ¶ 128.

<sup>4</sup> Emergency Petition of TracFone Wireless, LLC for an Order Directing USAC to Alter the Implementation of the National Verifier to Optimize the Automated and Manual Eligibility Verification Processes, WC Docket Nos. 17-287, 11-42, 09-197, at 2 (filed August 9, 2018) ("TracFone Petition").

telecommunication carriers (“ETCs”) and the National Verifier’s online eligibility determination portals is one such flaw that needs correction.

Today, the use and adoption of APIs is far from experimental. They have become an essential tool that entities – be they private or public sector – utilize to reach their targeted audience through machine-to-machine communication. More than half of all the traffic for major companies like Twitter and eBay come through APIs,<sup>5</sup> and there are now over 400 APIs found across federal agencies to help facilitate interoperability, openness, and transparency.<sup>6</sup> USAC itself uses APIs for other aspects of the National Verifier.

The inexplicable absence of APIs between carrier enrollment sites and the Verifier’s automated online portals will have myriad negative consequences for all Lifeline stakeholders. Specifically, the exclusion of APIs will: (i) frustrate consumers’ ability to enroll in Lifeline; (ii) undermine the ability of carriers to partner with third-party organizations to facilitate enrollment; and (iii) impose significant administrative burdens on USAC and service providers while making the enrollment process more vulnerable to abuse than it would be if carriers had access to APIs. Because these significant and deleterious outcomes directly contravene the Commission’s vision for the Verifier, USAC’s ill-advised choice must be reversed.

**A. Without APIs, Lifeline Enrollment Will Be Unnecessarily Difficult and Burdensome for Consumers.**

The inevitable result of USAC’s decision not to include an API for Lifeline service providers for the National Verifier’s eligibility verification portals, including its checklifeline.org online portal for consumers and the service provider portal, is that customer information will need

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<sup>5</sup> Goods and Services Administration /Developer Program (18F Team), “Introduction to APIs in Government” [https://api-all-the-x.18f.gov/pages/introduction\\_to\\_APIs\\_in\\_government/](https://api-all-the-x.18f.gov/pages/introduction_to_APIs_in_government/).

<sup>6</sup> Kin Lane, “State of APIs In The Federal Government” (Jul. 27, 2017), <https://apievangelist.com/2017/07/27/state-of-apis-in-the-federal-government/>.

to be manually entered twice during the Lifeline enrollment process for eligible subscribers: once into the National Verifier's own eligibility verification and enrollment system via one of the portals, and a second time into the service provider's own customer database. TracFone agrees with Q Link that "successful online enrollment depends on the service provider's ability to integrate eligibility verification and service enrollment into a continuous process, and to provide dogged assistance and support to the customer."<sup>7</sup> Without a mechanism for ETCs' websites and systems to exchange information with the National Verifier's portals and vice versa, the process for Lifeline application will be far more burdensome for consumers in terms of both the sheer number of steps it takes to enroll in Lifeline as well as the availability of customer support from service providers throughout the entire process.

USAC has acknowledged the valuable role ETCs can play in the enrollment process by creating a specific service provider portal for an ETC's agents to enroll customers in person, thereby preserving the ability of a customer to participate in Lifeline with the assistance of a carrier in those limited circumstances. Furthermore, under USAC's current design, Lifeline customers have no ability to enroll in Lifeline without the assistance of a service provider because only service providers can enroll an eligible customer in Lifeline using the National Lifeline Accountability Database ("NLAD"). Nevertheless, USAC's inexplicable refusal to provide the National Verifier's API to service providers needlessly bifurcates the current one-step eligibility verification and enrollment process a prospective customer seamlessly experiences today into a tedious, two-step process of eligibility verification with the National Verifier followed by enrollment with the service provider that requires duplicative data entries on the part of the customer. As Q Link explains, the National Verifier with APIs can support both a one-step

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<sup>7</sup> Q Link Petition at 15.

eligibility verification/enrollment process, place USAC in the position of making all eligibility verification determinations, and ensure that consumers are signing the exact acknowledgements and certifications that USAC as prescribed through its mandatory forms.<sup>8</sup>

Despite USAC's own recognition of the central role service providers play in the Lifeline enrollment process, it has chosen to eliminate a Lifeline applicant's ability to first go to a service provider and utilize any non-in-person means to initiate a one-step eligibility verification and enrollment process. In doing so, USAC's decision not to provide the National Verifier's API to service providers further disadvantages a significant subset of our nation's neediest: those who experience challenges with mobility. As Q Link points out, the exclusion of APIs threatens access to Lifeline service for "millions of low-income Americans in rural areas, and . . . other Americans that are uniquely dependent on online enrollment, such as veterans with disabilities or homebound seniors."<sup>9</sup> USAC should be mindful about how to facilitate, not hamper, enrollment by these particularly disadvantaged populations.

**B. The Cumbersome Enrollment Process Will Undermine Partnerships Between Service Providers and Third-Party Organizations Designed to Facilitate and Increase Lifeline Enrollment.**

USAC's unjustifiably inefficient enrollment process will further harm the Lifeline program by undermining the efficacy of partnerships between ETCs and third-party organizations that seek to encourage Lifeline participation and facilitate enrollment. TracFone is always thinking about how it can improve outreach to eligible consumers and provide innovative service offerings that do more than just provide connectivity. The absence of streamlined enrollment processes lessens

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<sup>8</sup> Q Link Petition at 5, 23-24.

<sup>9</sup> Q Link Petition at 13.



the benefits of these types of partnerships and reduces their value to the carriers, organizations, and consumers.

One of the areas in which TracFone has made great strides in achieving synergies with organizations focusing on human needs is in the area of health care. As TracFone explained in its own Emergency Petition, TracFone's SafeLink Health Solutions helps millions of Lifeline subscribers improve their health outcomes through mobile health programs and free calls and text messages to participating managed care organizations ("MCOs").<sup>10</sup> Through partnerships with MCOs, customers have access to innovative programs that help them manage their health care and access information about their treatment. Information regarding the availability of Lifeline services is often jointly presented to an MCO's Medicaid clients by the MCO and TracFone, and eligible customers are directed to apply for Lifeline through a SafeLink website that seamlessly communicates with USAC's NLAD to enroll eligible customers.

In addition to the MCOs, TracFone has established relationships with anti-poverty social services organizations such as the Salvation Army and the Community Action Partnership to promote the availability of Lifeline services through TracFone's SafeLink brand. In certain instances, these social services organization make available computer terminals to their clients who may not otherwise have access to the Internet to enable their access to SafeLink's Lifeline application online. Again, these ETC-created webpages rely on the API for NLAD provided by USAC to enable online enrollment through a simple one-step process. Once the National Verifier is launched without the availability of the National Verifier API, however, an online Lifeline applicant will have to first submit their personal information for the purpose of verifying eligibility through the National Verifier's consumer portal, [checklifeline.org](http://checklifeline.org), wait for an undetermined

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<sup>10</sup> TracFone Petition at 12.

amount of time for the National Verifier to confirm the applicant's eligibility through either an automated or manual process, then search for and select a provider of the applicant's choice while resubmitting their personal information, this time with the provider, for Lifeline enrollment.

Without a seamless and streamlined process that enables consumers to enroll in Lifeline entirely through a service provider's website if they so choose, the value of the provider's partnerships with third parties is greatly diminished. Gone are the one-step, API-enabled application websites created by ETCs that social services organizations can make referrals to and direct their clients. Also gone is an ETC's incentive to market the availability of Lifeline services through traditional advertising channels or social media, since such advertisement can no longer direct traffic to an ETC-created website for Lifeline application and be assured of even a modest return on their advertising investment. The chart on the next page illustrates the predicament TracFone faces in the three soft launch states (Utah, New Mexico, and Mississippi) that TracFone currently provides Lifeline service.

Marketing Channel	Available Means of Enrollment through a Seamless Eligibility + Enrollment Process	
	Current Regime	National Verifier Regime
<b>Advertising</b>		
TV	ETC Web	✗ None
Radio	ETC Web	✗ None
Direct Mail	ETC Web	✗ None
Social Media	ETC Web	✗ None
Affiliates		
Web Marketing	ETC Web	✗ None
<b>Social Services</b>		
Salvation Army	ETC Web	✗ None
Community Action Partners	ETC Web	✗ None
Lifeline Community Partners	ETC Web	✗ None
<b>Retail Partners</b>		
Wal-Mart	ETC Web	✗ None
Others National Partners	ETC Web	✗ None
Web	ETC Web	✗ None
IVR	Paper Processing	✗ None
<b>HealthSolutions</b>		
Cigna (Mississippi)	Paper Processing, ETC Web	✗ None
Presbyterian (New Mexico)	Paper Processing, ETC Web	✗ None
Molia (New Mexico)	Paper Processing, ETC Web	✗ None
Health Choice (Utah)	Paper Processing, ETC Web	✗ None
<b>Grassroot</b>		
Field Agents	Tablet	✓ Service Provider Portal

Accordingly, USAC's decision to exclude APIs from the online verification process endangers partnerships that otherwise not only would facilitate and increase enrollment in Lifeline by eligible subscribers, but also provide such subscribers with innovative and beneficial programs that empower them to improve other aspects of their lives.

**C. The Eligibility Verification Process Will Be Administratively Burdensome and Vulnerable to Abuse.**

USAC's misguided implementation of the National Verifier not only will encumber the Lifeline enrollment process for customers, thereby threatening access to these critical services, but also will create significant administrative burdens for USAC and ETCs. Further, USAC's process is far more vulnerable to abuse than if USAC enabled integrated online enrollment by service providers through the inclusion of an API.

USAC's decision to withhold APIs that would have enabled machine-to-machine communication between an ETC's online application platforms and the National Verifier's own eligibility verification portals is the height of administrative inefficiency. As previously discussed, under the enrollment regime USAC has selected, either the service provider or the Lifeline applicant will be forced to manually re-enter information that the consumer has already provided to USAC. This is not only duplicative and unnecessarily burdensome, but also increases the risk of mismatched data entries between the records maintained by the National Verifier and those maintained by service providers, which could lead to errors in the NLAD.

Moreover, USAC's exclusion of APIs creates tremendous administrative burdens for USAC itself. Carriers today have rigorous screening procedures in place to verify Lifeline subscribers. Using these procedures, Lifeline service providers process hundreds of thousands of enrollment inquiries every month.<sup>11</sup> TracFone, like Q Link, "performs a robust series of screens to ensure that applicants will have network coverage, are who they say, and are eligible under the program."<sup>12</sup> Failing to provide APIs, however, prevents carriers from conducting this critical

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<sup>11</sup> TracFone Wireless, Inc., Ex Parte Presentation: Bridging the Digital Divide for Low-Income Consumers, WC Docket No. 17-287, Attachment 1, "SafeLink Proposal for the New National Verifier," slide 15 (filed July 20, 2018) ("TracFone Ex Parte").

<sup>12</sup> Q Link Petition at 15.

prescreening role, leaving USAC—which lacks the institutional expertise and procedural efficiencies achieved by service providers over years of conducting Lifeline eligibility verification—to process all inquiries. As a result, TracFone agrees that “USAC can expect to be deluged with never-completed applications, inquiries both about the eligibility process as well as about aspects of Lifeline service controlled by service providers (such as where service is offered and the nature of service plans), and documents that cannot be used to verify identity or eligibility because they are the wrong documents or illegible.”<sup>13</sup> The chart below illustrates the tremendous amount of work TracFone must do monthly to screen millions of inquiries and hundreds of thousands of created applications to ultimately send completed applications to NLAD—work that would fall to USAC if carriers cannot perform prescreening.

Current SafeLink Enrollment Process				Proposed NV Enrollment Process			From All the data Entered into the NV, Only these % will be Qualified in NV
2017	Leads	Created Applications	Qualified Applications Sent to NLAD (due to SafeLink filter)	Leads Entered into the NV	Expected Applications Sent to NV	Expected Qualified Applications from NV	
January	6,113,786	326,638	197,808	6,113,786	6,113,786	197,808	3.2%
February	4,757,981	315,376	175,431	4,757,981	4,757,981	175,431	3.7%
March	5,987,579	359,381	192,037	5,987,579	5,987,579	192,037	3.2%
April	5,685,874	386,127	200,943	5,685,874	5,685,874	200,943	3.5%
May	6,177,017	427,245	240,714	6,177,017	6,177,017	240,714	3.9%
June	7,273,904	489,131	262,027	7,273,904	7,273,904	262,027	3.6%
July	8,239,101	489,901	264,280	8,239,101	8,239,101	264,280	3.2%
August	8,219,521	510,940	292,449	8,219,521	8,219,521	292,449	3.6%
September	5,665,393	373,557	205,052	5,665,393	5,665,393	205,052	3.6%
<b>Total</b>	<b>58,120,156</b>	<b>3,678,296</b>	<b>2,080,741</b>	<b>58,120,156</b>	<b>58,120,156</b>	<b>2,030,741</b>	<b>3.5%</b>

Permitting ETCs to retain their prescreening role will ease the administrative burden on USAC both by greatly reducing the need for USAC to conduct such prescreening and by ensuring that once an inquiry ultimately makes it to USAC, the information provided is far more likely to be accurate and complete. As Q Link describes, if the National Verifier online portal were accessible through an API, ETCs would be able to “submit to the National Verifier only those

<sup>13</sup> *Id.* at 25.

application packages that are complete and thus likely to permit an immediate eligibility determination without repeated back-and-forth with the consumer.”<sup>14</sup> Indeed, carriers such as TracFone employ robust validation methods, such as Lexis Nexis validations and CASS and Melissa Data address validations, which go above and beyond USAC’s existing procedures to identify duplicate or ineligible customers.<sup>15</sup> In this way, USAC’s decision to exclude APIs from the Verifier’s online portal plainly undermines rather than serves the Commission’s policy goal of curbing Lifeline waste, fraud, and abuse.

## **II. THE COMMISSION SHOULD DIRECT USAC TO IMPLEMENT APPLICATION PROGRAMMING INTERFACES CONSISTENT WITH THE EMERGENCY PETITION.**

Q Link rightly explains that “USAC’s unexplained removal of carrier APIs may seem like a narrow technical issue, but it has tremendous policy implications that the Commission, and not USAC, must decide.”<sup>16</sup> As TracFone made clear in its own Emergency Petition, the Commission retained oversight authority over the National Verifier implementation process, which it can exercise without amending any of its regulations.<sup>17</sup>

Moreover, the relief requested in Q Link’s Petition does not represent a significant policy change for USAC in its implementation of the National Verifier. Importantly, USAC would retain authority over and ultimate responsibility for subscriber eligibility verification; USAC simply would be providing the necessary information exchange capabilities to allow ETCs to handle the initial steps of the process, thereby improving the online enrollment experience for consumers, enabling ongoing partnerships with third parties that encourage Lifeline participation, and

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<sup>14</sup> *Id.* at 25

<sup>15</sup> TracFone Ex Parte, Attachment 1 at slide 15.

<sup>16</sup> Q Link Petition at 13.

<sup>17</sup> TracFone Petition at 13-14.

enhancing the integrity and accuracy of information submitted to the National Verifier. Further, the concept of APIs is not novel to USAC, which already has elected both: (i) to employ APIs between the National Verifier online portal and state and federal qualifying program enrollment databases; and (ii) to rely on carrier APIs to populate the NLAD. As Q Link rightly observes, it is the “height of irony”<sup>18</sup> that USAC relies on APIs in these contexts yet refuses to implement them where doing so would indisputably streamline and improve the subscriber verification process, for the benefit of Lifeline consumers and in furtherance of the Commission’s policy goals. The Commission must correct course immediately.

### **III. CONCLUSION**

In light of the foregoing, TracFone respectfully urges the Commission to grant Q Link’s Emergency Petition and direct USAC to implement application programming interfaces between the online Lifeline enrollment processes offered by Lifeline service providers and the National Verifier’s eligibility verification processes.

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<sup>18</sup> Q Link Petition at 18.

Respectfully Submitted,

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